PARSONS **TECHNICAL MEMORANDUM**

6795 Edmond Street, Suite 150, Las Vegas, NV 89119 • Telephone: 702-789-2000 • Fax 702-789-2001 • www.parsons.com

DATE: August 3, 2011
Revised September 17, 2012

TO: File

FROM: Elvira Gaddi

SUBJECT: Pyramid Way and McCarran Boulevard Intersection Improvement Project
Draft EIS – Hazardous Waste and Materials
FHWA-NV-EIS-12-01-D
RTC Project No. 73299
Federal Project No. CM-0191-(063)

Project Description

The Regional Transportation Commission of Washoe County (RTC), in cooperation with the Nevada Department of Transportation (NDOT) and the Federal Highway Administration (FHWA), is studying operational improvements to the intersection of McCarran Boulevard (State Route [SR] 659) and Pyramid Way (SR 445) in Sparks, Washoe County, Nevada.

The Modified Expanded At-Grade Intersection Alternative would widen Pyramid Way to three lanes in each direction from a reconfigured Queen Way on the north to Tyler Way on the south. McCarran Boulevard would remain two lanes in each direction. Operational improvements at the intersection would consist of additional turning lanes: eastbound McCarran Boulevard to northbound Pyramid Way; westbound McCarran Boulevard to southbound Pyramid Way; westbound McCarran Boulevard to northbound Pyramid Way; northbound Pyramid Way to westbound McCarran Boulevard; and southbound Pyramid Way to westbound McCarran Boulevard. Widening of Pyramid Way would occur on the east side to accommodate these improvements. For the additional turning lanes on McCarran Boulevard at Pyramid Way, widening would be required on the north and south sides of McCarran Boulevard between Pyramid Way and 4th Street.

The existing Queen Way intersection would be redesigned to improve access to the surrounding neighborhoods by moving and reconfiguring the west leg to provide additional storage for eastbound travelers on Queen Way and discourage the use of Wedekind Road as a bypass; the east leg would remain at its current location and be a right-in/right-out intersection, with a raised median along the right-out lane through the west leg to discourage a three-lane weave and u-turn for drivers that want to go south on Pyramid Way. Additional improvements proposed as part of this project include extending the existing 5-foot-wide sidewalks throughout the project limits; adding a 5-foot-wide landscaped buffer/parkway strip between the sidewalks and the traveled way; and adding striped bicycle lanes on Pyramid Way from Queen Way to York Way and on McCarran Boulevard from Rock Boulevard to 4th Street. The additional ROW that would be available along the east side of Pyramid Way with the proposed improvements may allow room for a 10-foot-wide sidewalk and/or a wider buffer strip.

Study Methodology

A baseline hazardous waste/material survey was conducted to identify the location of known or suspected sites potentially affecting development of transportation improvements. If known or suspected waste sites are identified, the locations are mapped by their relationship to the project under consideration. If a known or suspected hazardous waste site is affected by a proposed project alternative, information about the site; the potential involvement, impacts, and public health concerns of the affected alternative(s); and the potential mitigation measures to eliminate or minimize impacts or public health concerns are evaluated.

A Phase 1 Environmental Site Assessment (ESA) is also used to establish baseline conditions at the project site and identify "recognized environmental conditions," particularly where real estate acquisitions may be involved. The American Society for Testing and Materials (ASTM) Standard Practice E 1527-05 (Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process) is an accepted method for conducting Phase 1 ESAs. "Recognized environmental conditions" are defined in the ASTM Standard Practice E 1527-05 as "the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property." The term includes hazardous substances or petroleum products even under conditions in compliance with applicable laws. The term is not intended to include *de minimis* conditions that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. The ASTM standard also provides guidance for including other materials that are not included in the definition of hazardous substances under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). These materials include, but are not limited to, asbestos-containing materials (ACM) and lead-based paint (LBP). In the State of Nevada, a Phase 1 ESA may only be performed by a Certified Environmental Manager (CEM).

Per the ASTM Standard, a Phase 1 ESA is presumed valid within 180 days of acquisition of real property. A Phase 1 ESA will then be conducted just prior to the acquisition of real property required for this project. Based on currently available information, it is anticipated that a hazardous materials survey of the properties to be acquired will also be conducted to confirm the presence of suspect hazardous substances and others not under the purview of CERCLA.

Track Info Services, LLC (Track Info), an environmental database search company, was retained to search applicable regulatory agency lists and standard environmental record sources to identify properties within and near the proposed project impact area that may have adverse environmental conditions relating to the presence of hazardous wastes or materials. Historical topographic maps, aerial photographs, and fire insurance maps (prepared by the Sanborn Fire Insurance Company) covering the project site were also requested from Track Info as basis for additional analysis with regards to the presence of hazardous substances.

Regulatory Standards/Criteria

Hazardous wastes are regulated by the federal government through the Resource Conservation and Recovery Act of 1976 (RCRA) and amendments, and CERCLA and amendments, as well as implementing federal regulations in Title 40 of the CFR. CERCLA permits the user of a Phase 1

ESA one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on CERCLA liability.

In addition, the State of Nevada regulates hazardous materials and wastes through sections of the NRS and Nevada Administrative Code, Chapter 459.

Sites with known or suspected hazardous waste or material contamination were identified by an environmental database search and evaluated to assess potential project impacts. Any such sites that are known or suspected to be contaminated with hazardous wastes because of historical use, storage, or release of hazardous materials at the site were assessed.

Environmental Database Search Report

Hazardous Material Sites within the Project Boundaries

The environmental database search identified two sites that are listed in Federal and state environmental databases as being located within the proposed project boundaries. These are:

- VIP Cleaners, 2885 McCarran Boulevard – VIP Cleaners is listed in the RCRA Generators and the RCRA No Longer Report (NLR) databases. The database indicates that this facility was a "conditionally exempt generator" of hazardous wastes, but it is no longer generating hazardous waste in quantities that require reporting. Hazardous wastes previously generated at this site consisted of spent halogenated solvents associated with the dry cleaning process. There were no violations reported for this site.
- Exxon Gas Station, Corner of Pyramid Way and Tyler Way – This gas station is listed in the Emergency Response Notification System (ERNS) database due to a spill of unleaded gasoline from a leaking pump nozzle that was reported to the National Response Center in January 1998. The volume of the spill is unknown, and no corrective actions were required. There were no violations reported for this site.

Hazardous Materials Sites near the Project

Hazardous material sites near the project were identified from the environmental database search report using search distance criteria that meets or exceeds the requirements of ASTM Standard 1527-05, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process. The environmental database search report identified the following:

- Four registered small quantity "conditionally exempt generators" of hazardous wastes with no violations (search criteria: within 0.25-mile of the project boundaries).
- Two former hazardous waste generators (no longer reporting) with no violations (search criteria: within 0.125-mile of the project boundaries).
- One closed ERNS site (leaking heating oil tank discovered during tank removal) (search criteria: within 0.125-mile of the project boundaries).
- Twenty-two (22) State sites (Corrective Action Cases) of which all 22 are closed (search criteria: within 1-mile of the project boundaries).
- Four closed leaking underground storage tank sites (search criteria: within 0.5-mile of the project boundaries).

- One active and four closed (permanently not in use) underground storage tank sites with no violations (search criteria: within 0.25-mile of the project boundaries).

Seven of the eight identified active hazardous material sites within 1-mile of the project boundaries are identified in Figure 1. The State site under investigation described above, which is located at 1629 G Street, is not within coverage of the aerial photograph.

Figure 1 Active Hazardous Material Sites within the Proposed Project Boundaries

Review of Historical Topographic Maps and Historical Aerial Photographs

Historical topographic maps of the project site are available for the years 1951, 1967, 1974, and 1982. Historical aerial photographs of the project site are available for the years 1946, 1956, 1966, 1980, 1994, and 2006.

The 1946 aerial photograph is consistent with what is shown in the 1951 topographic map; however, the aerial photograph shows that the project site and the surrounding area were in agricultural use. The 1956 aerial photograph is similar to the 1946 photograph, except there are additional structures east of Pyramid Way that look like large warehouses.

On the 1951 topographic map, Pyramid Way is shown as a primary highway, while McCarran Boulevard did not exist at the time, except for a trail along the current alignment of McCarran

Boulevard west of Pyramid Way. Pyramid Way is shown as a north-south highway that connects to Highway 33 at its northern terminus. The KOLO radio towers and two buildings are shown as the closest structures to the project site. The one building in the southwest quadrant of the current intersection of McCarran Boulevard and Pyramid Way may have been associated with the KOLO radio towers. The other building is located on Pyramid Way, south of its intersection with McCarran Boulevard. Large-scale residential or commercial development around the project site was nonexistent. The 1966 aerial photograph shows large-scale housing developments in the northeast, southeast, and southwest areas of the project site, with the exception of the area occupied by the KOLO radio towers. The 1967 topographic map reflects such development except on the east side of Pyramid Way, which does not show the housing developments. On the topographic map, Pyramid Way is identified as Highway 32. Both the 1966 aerial photograph and the 1967 topographic map show the northbound connector from Pyramid Way to Highway 33 and a large structure that is at the northwest corner of Pyramid Way and Tyler Way. The aerial photograph shows a large white roof that is consistent with the canopy of a gasoline station.

The 1974 topographic map shows additional housing and related development (e.g., area schools, parks, libraries, and other community facilities). The 1980 and 1994 aerial photographs and the 1982 topographic map are consistent, showing additional development in the general project area, but still not showing any development on the KOLO radio towers site. The 2006 aerial photograph shows additional in-fill development, including what looks like a large retail establishment at the KOLO radio towers site. The aerial photographs from 1966 to 2006 show an increasing progression in the development of McCarran Boulevard, especially on the west side of Pyramid Way.

The progression of development in the area as evidenced in the historical topographic maps and aerial photography is consistent with the database report for the types of facilities that use hazardous materials and/or generate hazardous waste in the general area of the project site. These facilities include dry cleaners, gas stations, schools, shopping centers, and retail establishments that support the residents in the area. There do not seem to be any industrial facilities in the general area.

This project would require the removal of houses along the east side of Pyramid Way and along the north and south sides of McCarran Boulevard east of Pyramid Way. Based on the historical topographic maps and aerial photographs, these houses were constructed before or during 1966, prior to heightened regulation of asbestos-containing building materials and lead in paint; therefore, it must be assumed that ACMs and LBP are present in the homes to be demolished. ACMs can be found in floor coverings such as vinyl floor tiles and linoleum; adhesives used for floor coverings, baseboards, and carpet; wallboard; joint compound; spray-on ceilings; roofing materials (e.g., tar, asphalt paper, and shingles); heating oil piping insulation; transite panels used as siding; and other building materials. Lead may also be found in plumbing. Based on the year of construction of these houses, other hazardous materials that could be present include polychlorinated biphenyls (PCBs) found in fluorescent light ballasts, capacitors, and transformers; mercury in old light switches; and radioactive sources in old smoke detectors.

Impacts

Construction Impacts

Hazardous wastes encountered during construction of the proposed project would result in unavoidable adverse impacts if the wastes are not managed properly and/or releases to the environment occur without appropriate cleanup. If not handled, managed, and disposed properly prior to construction, hazardous wastes and hazardous substances identified previously, including non-CERCLA regulated materials such as ACMs and LBP, could result in delay in construction and exposure of construction workers to unsafe and unhealthful site conditions (i.e., noncompliance with applicable federal and state environmental and safety regulations); however, existing federal and state laws and regulations provide stringent control over hazardous waste management, as well as prevention and response to spills and releases. Compliance with all existing federal, state, and local (county/city) hazardous waste laws and regulations would be required during construction of the proposed project.

The following sections evaluate potential project construction impacts related to the hazardous waste and material sites previously identified.

No Build Alternative

The No Build Alternative would leave existing conditions as they are; therefore, no construction impacts would occur. No acquisition of properties would occur and any ongoing investigations/ remediation would continue.

Build Alternative

Under the Build Alternative, houses along the east side of Pyramid Way and along the north and south sides of McCarran Boulevard would be acquired as part of the proposed intersection improvements. Prior to the acquisition of real property, a Phase 1 ESA would be conducted to identify recognized environmental conditions. Hazardous materials surveys would also be conducted.

These houses would be demolished, potentially resulting in the generation of hazardous or regulated demolition debris associated with the hazardous building materials previously identified. If not handled and disposed of properly, hazardous or regulated demolition debris wastes could contaminate the construction site and present worker exposure concerns, and cause schedule and cost impacts.

None of the hazardous material sites within the project site, as identified in the environmental database search report, would be acquired; therefore, there would be no construction impacts from these sites.

Operational Impacts

Upon completion of the project, traffic operations from the proposed project would not normally result in the generation of hazardous wastes that would impact operation of the roadway. On occasion, release of hazardous materials may occur on the project site as a result of vehicular incidents, particularly those involving vehicles transporting hazardous materials. These releases would be expected to be cleaned up as part of the response to each vehicular incident by local emergency personnel.

Mitigation

Mitigation of Construction Impacts

To minimize construction impacts from the proposed project, the construction contractor will have in place an Environmental Protection Plan (EPP) to include the management of hazardous materials and hazardous wastes in accordance with applicable local, state, and federal regulations. Prior to demolition of any houses, a Phase 1 ESA and a hazardous materials survey of those houses will be conducted to identify/confirm the locations and quantities of any hazardous materials. The Phase 1 ESA will be performed by a Nevada CEM. The survey results will be used to develop the portions of the EPP relating to hazardous materials/hazardous waste management, transport, and disposal. Hazardous wastes generated at the project site will need to be analyzed in accordance with applicable U.S. Environmental Protection Agency (EPA) methods prior to disposal to determine disposal options.

The project proponent will need to apply for an EPA generator identification number to be used for tracking hazardous wastes generated and disposed of from the project site. Transporters and disposal sites will be required to have valid permits held by the owners/operators, expected to be already in place, for these transport services and disposal facilities.

Mitigation of Operational Impacts

No specific mitigation measures would be required for the proposed Build Alternative. Local, state, and federal programs for the management of hazardous materials/hazardous wastes and emergency response under RCRA and CERCLA should be adequate to address any operational impacts if they occur. In addition, Department of Transportation regulations for the transport of hazardous materials provide additional requirements to preclude the accidental release of hazardous materials on roadways.

I, John H. Johnson, (EM – 1507, expires 3/8/14), hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and to the best of my knowledge comply with applicable federal, state, and local statutes, regulations and ordinances.

Respectfully,

PEZONELLA ASSOCIATES, INC.

John H. Johnson, P.E.
Senior Geologist, EM-1507